

## REMARKS

The Office Action mailed May 17, 2007 has been received and carefully considered. In this Response, claims 27, 29, 33, 34, and 36-39 have been amended. Claims 45 and 46 have been amended. Support for the amendments and the new claims can be found in the specification and figures as originally filed. Claims 28 and 35 have been cancelled without prejudice or disclaimer. Reconsideration of the currently pending claims is respectfully requested in light of the following remarks.

### **Rejection of claim 38 under 35 U.S.C. § 112**

At page 2 of the Office Action, claim 38 is rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. This rejection is respectfully traversed.

Claim 38 recites “the second set of classes includes a second set of relations different from the first. As acknowledged by the Office Action at page 2, the originally filed specification describes relations. However, the Office Action asserts that “there does not appear to be any description [in the specification] of ‘a second set of relations different from the first.’” Applicant respectfully disagrees. The specification provides ample support for claim 38. For example, at page 16, lines 8-10, the specification states that a “mobile data model will preferably describe transactions and definite connections between individual data classes, **expressing relationship and dependency relationships**, to streamline access to data by applications” (emphasis added). Further, pages 36-37 of the specification describe how the relations in a mobile data model can be created and changed. One skilled in the art would understand creating these different relationships includes creating different relationships in different data models. Accordingly, claim 38 complies with the Section 112, first paragraph.

In view of the foregoing, it is respectfully requested that the Section 112 rejection of claim 38 be withdrawn and the claim reconsidered.

**Anticipation Rejection of Claims 34-37, 39-42, and 44**

At page 3 of the Office Action claims 34-37, 39-42, and 44 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,636,873 to Carini. This rejection is respectfully traversed.

Claims 34 recites “a second mobile data model including a second set of classes which includes some but not all of the available set of classes in the enterprise data store, the second set of classes different from the first.” These elements are not disclosed by Carini. Carini discloses a system for synchronizing mobile devices with a replication database. *Carini*, Abstract and FIG. 4. To synchronize the mobile devices, the replication database provides data snapshots to the mobile devices. *Id.*, col.7, lines 21-35. However, as illustrated in Carini, FIG. 4, each replication database used to synchronize the mobile devices *is the same*. Accordingly, assuming *arguendo* that the replication database is based on a mobile data model, it is based on a single mobile data model. Accordingly, Carini necessarily fails to disclose or suggest a first mobile data model and a second mobile data model different from the first.

Claims 36-37, 39-42, and 44 depend from claim 34. Accordingly, Carini fails to disclose each and every element of claims 36-37, 39-42, and 44, at least by virtue of their dependence on claim 34. In addition, claims 35-37, 39-42, and 44 recite additional novel elements. To illustrate, claim 37 recites “wherein the first set of classes is selected for a first mobile device type and the second set of classes is selected for a second mobile device type.” As explained above, the replication database, identified by the Office as the first mobile data model, is used to synchronize all mobile devices in the Carini system. Accordingly, the replication database is not **selected for a first mobile device type** as recited in claim 37.

With respect to claim 35, the claim has been cancelled without prejudice or disclaimer, thereby obviating the rejection.

In view of the foregoing, it is respectfully requested that the anticipation rejection of claims 34-37, 39-42, and 44 be withdrawn and the claim reconsidered.

### **Obviousness Rejection of Claims 27-33**

At page 3 of the Office Action claims 27-33 are rejected under 35 U.S.C. § 102(e) as being anticipated by Carini in view of U.S. Patent No. 7,188,332 to Charisus. This rejection is respectfully traversed.

Claim 27 recites “a second mobile data model including a second set of classes, the second set of classes including some but not all of an available set of classes in the enterprise data store, the second set of classes different from the first set of classes.” As explained above, Carini does not disclose these elements. Further, Charisus does not remedy the deficiency of Carini. Accordingly, the cited references, individually and in combination, fail to disclose or suggest each and every element of claim 27.

Claims 29-33 depend from claim 27. Accordingly, the cited references fail to disclose each and every element of claims 29-33, at least by virtue of their dependence on claim 27. In addition, claims 29-33 recite additional novel elements.

With respect to claim 28, the claim has been cancelled without prejudice or disclaimer, thereby obviating the rejection.

In view of the foregoing, it is respectfully requested that the obviousness rejection of claims 27-33 be withdrawn and the claim reconsidered.

### **Obviousness Rejection of Claim 38**

At page 9 of the Office Action claim 38 is rejected under 35 U.S.C. § 102(e) as being anticipated by Carini in view of “Principles of Object Oriented Analysis and Design” by Martin. This rejection is respectfully traversed.

Claim 38 depends from claim 34. As explained above, Carini fails to disclose or suggest each and every element of claim 34. Further, Martin does not remedy the deficiency of Carini. Accordingly, the cited references, individually and in combination, fail to disclose or suggest each and every element of claim 38, at least by virtue of its dependence on claim 34. In addition, claim 38 recites additional novel elements.

In view of the foregoing, it is respectfully requested that the obviousness rejection of claim 38 be withdrawn and the claim reconsidered.

**New Claims 45 and 46**

Claims 45 and 46 have been added. The cited references fail to disclose each and every element of these claims. For example, none of the cited references discloses or suggests “wherein the first set of classes includes a first class and wherein the second set of classes omits the first class” as recited in claims 45 and 46. Accordingly, consideration and allowance of claims 45 and 46 is respectfully requested.

**Conclusion**

Should the Examiner deem that any further action by the Applicants would be desirable for placing this application in even better condition for issue, the Examiner is requested to contact Applicants' undersigned agent at the number listed below.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-3797.

Respectfully submitted,

August 16, 2007

Date

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